

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF TEXAS - FORT WORTH DIVISION**

THE NAUGHTYS, LLC. §
Plaintiff, §
§
v. §
§
DOES 1-580, §
Defendants. §

Case No. 4:21-cv-00492

**DEFENDANTS' MOTION TO DISSOLVE PRELIMINARY INJUNCTION
AND LIFT ASSET RESTRAINT**

NOW COME the Shan Defendants¹ ("Defendants"), by and through their undersigned counsel, and respectfully move this Court to dissolve the preliminary injunction [Dkt. 81] or, at a minimum, modify the asset restraint according to the principles of equity and based of documentation submitted herewith.

An associated memorandum is filed in support.

¹ Following this Court's identification in [Dkt. 81]: 560 yingli520, 561 yangsuiqwe, 575 aishengheji, 576 LiusaIuy, 532 Bakheng, 526 bismarck, 533 adriaticgo, 538 ashur80, 527 montgomery, 302 Shimigy, 220 COL beans, 232 milkcha, 342 PIKAqiu33, 256 cocounut, 285 Ikevan, 333 Surgical, 201 Clearance&100%quality,NyaKLI, 225 Fhci-HR, 355 who-canside 90% Discount Fast Delivery, 313 much MUCHYOU ★ 90% Discount Cyber Monday★Direct, 226 Vdaye, 218 GJK-SION, 348 OFMWBN, 244 douk-Quite, 238 Chenjbo (Halloween clearance&Christm as clearance), 221 Mariee, 189 Shan-s, 206 Debouor, 249 S5E5X, 250 xatos, 307 TBKOMH (2021 Golden Moment: Up to 80% off), 335 ZEFOTIM Big Promotion!!!, 367 GREFER, 412 easyshopping66, 391 AtlantaMart2005, 511 xxzfalcon849, 411 e1xytrep, 402 CincinnatiStore, 423 globalfashion2010, 505 wishmart2014, 396 bodhi1998, 433 hongyinlon0, 413 eridu905, 390 Atlanta1816, 414 eriophoroidesxx, 474 rockfoilcrabbh, 486 SZbhkei12, 516 yupaxxs, 460 Nannouth, 443 KansasDeal, 426 GreatSpringfield, 501 watch_deal, 422 gilroy2012, 434 hotdeal320, 515 yishengmall2014, 395 bigbigshow2012, 406 Denver0806, 437 hutrsate51, 466 ppktjfa8612, 228 CO CO-US, 248 YHCWJZP, and 301 Hilyo.

Respectfully submitted,

/s/Warren V. Norred, P.E.
Warren V. Norred, P.E.
NORRED LAW, PLLC
515 East Border Street
Arlington, Texas 76010
817.704.3984 office
817.524.6686 fax

Counsel for Shan Defendants

Adam E. Urbanczyk
Au LLC
564 W. Randolph St. 2nd Fl.
Chicago, IL 60661
adamu@au-llc.com
312. 715.7312
ARDC: No. 6301067
Pro hac vice pending

CERTIFICATE OF SERVICE

I certify that a copy of the attached document was served upon the above-named counsel via the court's e-file system on June 24, 2021.

/s/ Warren V. Norred

Warren V. Norred